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*Attorneys for Plaintiff Dorothea Heimbach*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

DOROTHEA HEIMBACH,

Plaintiff,

vs.

STANISLAUS COUNTY, JUSTIN  
CAMARA, and ZA XIONG,

Defendants.

2:23-cv-01887-DJC-CSK

*Assigned to:*  
District Judge Daniel J. Calabretta

**PLAINTIFF'S PROPOSED  
VERDICT FORM**

FPTC Date: December 18, 2025  
Time: 1:30 PM  
Location: Courtroom 7

PLEASE TAKE NOTICE that Plaintiff Dorothea Heimbach hereby submits  
Plaintiff's Proposed Verdict Form for the trial of this matter.

**PLAINTIFF'S PROPOSED VERDICT FORM**

We, the jury in the above-entitled action, find the following:

**FOURTH AMENDMENT EXCESSIVE FORCE CLAIM**

**QUESTION 1:** Did defendants use excessive or unreasonable force or integrally participate in the use of excessive or unreasonable force against Anthony Silva?

Justin Camara \_\_\_\_\_ YES \_\_\_\_\_ NO

Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

*If you answered "Yes" for either defendant, proceed to Question 2.*

*If you answered "No" for both defendants, proceed to Question 3.*

**QUESTION 2:** Was the use of excessive or unreasonable force or integral participation in the use of excessive or unreasonable force a cause of injury, harm, or death to Anthony Silva?

Justin Camara \_\_\_\_\_ YES \_\_\_\_\_ NO

Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

*Proceed to Question 3.*

**BATTERY CLAIM**

**QUESTION 3:** Did the defendants use excessive or unreasonable force against Anthony Silva?

Justin Camara \_\_\_\_\_ YES \_\_\_\_\_ NO

Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

*If you answered "Yes" for either defendant, proceed to Question 4.*

*If you answered "No" for both defendants, proceed to Question 5.*

**QUESTION 4:** Was the use of excessive or unreasonable force by either of the defendants a cause of injury, harm, or death to Anthony Silva?

Justin Camara \_\_\_\_\_ YES \_\_\_\_\_ NO

Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

*Proceed to Question 5.*

**NEGLIGENCE CLAIM**

**QUESTION 5:** Were the defendants negligent?

Justin Camara \_\_\_\_\_ YES \_\_\_\_\_ NO

Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

*If you answered "Yes" for either defendant, proceed to Question 6.*

*If you answered "No" for both defendants, proceed to Question 10.*

**QUESTION 6:** Was the negligence of either defendant a substantial factor in causing injury, harm, or death to Anthony Silva?

Justin Camara \_\_\_\_\_ YES \_\_\_\_\_ NO

Za Xiong \_\_\_\_\_ YES \_\_\_\_\_ NO

*If you answered "Yes" for either defendant, proceed to Question 7.*

*If you answered "No" for both defendants, proceed to Question 10.*

**QUESTION 7:** Was Anthony Silva negligent?

\_\_\_\_\_ YES \_\_\_\_\_ NO

*If you answered "Yes," proceed to Question 8.*

*If you answered "No," proceed to Question 9.*

**QUESTION 8:** Was the negligence of Anthony Silva a substantial factor in causing his own injury, harm, or death?

\_\_\_\_\_ YES \_\_\_\_\_ NO

*Proceed to Question 9.*

**QUESTION 9:** What percentage of negligence that was a cause of Anthony Silva's injury, harm, or death do you assign to Justin Camara, Za Xiong, and Anthony Silva. (Total should equal 100%).

Justin Camara \_\_\_\_\_ %

Za Xiong \_\_\_\_\_ %

Anthony Silva \_\_\_\_\_ %

\_\_\_\_\_  
Total 100%

*Proceed to Question 10.*

**FOURTEENTH AMENDMENT CLAIM**

**QUESTION 10:** Did defendants engage in conduct that deprived Plaintiff of her familial relationship with Anthony Silva, in violation of the Fourteenth Amendment?

Justin Camara                      \_\_\_\_\_ YES                      \_\_\_\_\_ NO

Za Xiong                              \_\_\_\_\_ YES                      \_\_\_\_\_ NO

*Proceed to Damages.*

**DAMAGES**

*Please read the instructions before each question and answer only those questions you are directed to.*

*Answer Question 11 if you answered "Yes" for any defendant in Question 2, Question 4, or Question 6.*

**QUESTION 11:** What are Anthony Silva's damages for his pre-death pain and suffering and loss of life?

Pre-death pain and suffering:                      \$ \_\_\_\_\_

Loss of Life:    \$ \_\_\_\_\_

*Answer Question 12 if you answered "Yes" for any defendant in Question 4, Question 6, or Question 10.*

**QUESTION 12:** What are the Plaintiff's wrongful death damages for the loss of Anthony Silva?

Past wrongful death damages: \$ \_\_\_\_\_

Future wrongful death damages: \$ \_\_\_\_\_

*Please sign and date the verdict form and return it to the Court.*

Date: \_\_\_\_\_

Jury Foreperson